

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan
Hearing Date and Time:
Pursuant to OST

**NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER
AUTHORIZING THE DEBTOR TO (I) FILE AN UNREDACTED VERSION OF
ITS SUR-REPLY UNDER SEAL AND (II) SUBMIT CERTAIN CONFIDENTIAL
EXHIBITS TO THE SAME UNDER SEAL AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time (the “OST”) and Application, as defined below, to be submitted, LTL Management LLC, the above-captioned debtor (the “Debtor”), by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to submit an unredacted version of its *Debtor's Sur-Reply in Further Support of Omnibus Objection to Motions to Dismiss Chapter 11 Case* under seal.

PLEASE TAKE FURTHER NOTICE that, contemporaneously with the filing of the Debtor's Motion to Seal (the "Motion"), the Debtor filed an *Application for Order Shortening Time and Certain Other Relief* (the "Application") requesting that the Court hear its Motion on June 27, 2023, at 9:00 a.m.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor's undersigned counsel, (b) counsel to the Official Committee of Talc Claimants, (c) counsel to the Ad Hoc Committee of Supporting Counsel, (d) the legal representative for future talc claimants and her counsel, (e) the Office of the United States Trustee for the District of New Jersey and (f) any other party entitled to notice, by the time set forth in the Court's order entered with respect to the Application.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: June 26, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (admitted *pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

jlawlor@wmd-law.com

jpacelli@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.

Brad B. Erens, Esq.

Dan B. Prieto, Esq.

Amanda Rush, Esq.

2727 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 220-3939

Facsimile: (214) 969-5100

gmgordon@jonesday.com

bberens@jonesday.com

dbprieto@jonesday.com

asrush@jonesday.com

(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR